

033074 #25 3241 CL  
HADDON, MORGAN AND FOREMAN, P.C.  
Harold A. Haddon (HH-3929)  
(*ADMITTED PRO HAC VICE*)  
Saskia A. Jordan (SJ-8927)  
(*ADMITTED PRO HAC VICE*)  
150 E. 10<sup>th</sup> Avenue  
Denver, CO 80203  
Tel: 303-831-7364  
Fax: 303-832-2628

*Attorneys for Defendant  
Frederic A. Bourke, Jr.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA,  
  
PLAINTIFF,  
  
V.  
  
FREDERIC BOURKE, JR.,  
  
DEFENDANT.  
-----X

LAW OFFICE OF JOHN D. CLINE  
John D. Cline (JC-7132)  
(*ADMITTED PRO HAC VICE*)  
K.C. Maxwell (KM-8102)  
(*ADMITTED PRO HAC VICE*)  
115 Sansome Street, Suite 1204  
San Francisco, CA 94104  
Tel: 415-322-8319  
Fax: 415-524-8265

FILED  
U.S. DISTRICT COURT  
2011 MAR 24 PM 3:58  
S.D. OF N.Y.

**05 Cr. 518 (SAS)**

**MOTION FOR PRO HAC VICE  
ADMISSION OF  
MICHAEL E. TIGAR**

Frederic A. Bourke, Jr., through counsel, respectfully requests that Michael E. Tigar be permitted to appear before the Court *pro hac vice* as counsel for Mr. Bourke in the above-entitled action. Mr. Tigar is counsel of record for Mr. Bourke in the appeal of this matter currently pending before the Second Circuit Court of Appeals.

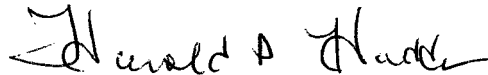
In support of his request, Mr. Bourke submits contemporaneously herewith the Declaration of Jill Shellow. Ms. Shellow is an attorney in good standing admitted to

practice in the Southern District of New York.

Counsel for Mr. Bourke has conferred with Assistant United States Attorney Harry A. Chernoff, who does not object to the appearance of Mr. Tigar *pro hac vice* in this matter.

Dated: March 23, 2011

Respectfully submitted,



---

Harold A. Haddon  
*ADMITTED PRO HAC VICE*  
HADDON, MORGAN AND FOREMAN, P.C.  
150 East 10<sup>th</sup> Avenue  
Denver, CO 80203  
Tel: 303-831-7364  
Fax: 303-832-2628

John D. Cline (JC-7132)  
K.C. Maxwell (KM-8102)  
*ADMITTED PRO HAC VICE*  
Law Office of John D. Cline  
115 Sansome Street, Suite 1204  
San Francisco, CA 94104  
Tel: 415-322-8319  
Fax: 415-524-8265

*Attorneys for Frederic A. Bourke, Jr.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA,

PLAINTIFF,

V.

FREDERIC BOURKE, JR.,

DEFENDANT.

**05 Cr. 518 (SAS)**

**DECLARATION OF  
JILL R. SHELL**

-----X

1. My name is Jill R. Shellow. I am over the age of eighteen and competent to make this declaration. I submit this declaration in support of the Motion of Frederic A. Bourke, Jr. for *Pro Hac Vice* Admission of Michael E. Tigar.

2. I am an attorney licensed to practice law and in good standing with the State of New York since 2000. My New York State Bar number is 558430. I was admitted to practice in the United States District Court for the Southern District of New York in 2000 and remain in good standing therewith. My bar number for the Southern District of New York is JS-2994.

3. I have known Michael E. Tigar since 1987.

4. Mr. Tigar's office is located at 552 Fearrington Post, Pittsboro, NC 27312.

5. Mr. Tigar was admitted to practice in the State of New York in 1993 and the District of Columbia in 1967. Certificates of good standing from each bar of admission

are submitted herewith. Mr. Tigar is also admitted to practice before numerous federal district and appellate courts and is in good standing with each.

6. I served as co-counsel with Mr. Tigar on a matter tried in this District, and thus I know him to be an experienced and skilled attorney who is familiar the Federal Rules of Procedure and the Local Rules of the United States District Courts for the Southern District of New York.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 22nd day of March, 2011.

A handwritten signature in black ink, appearing to read 'JRS', is written over a horizontal line.

JILL R. SHELOW  
Law Offices of Jill R. Shellow  
111 Broadway, Suite 1305  
New York, NY 10006  
Tel: 212.792.4911  
Email: [jrs@shellowlaw.com](mailto:jrs@shellowlaw.com)



*State of New York*  
*Supreme Court, Appellate Division*  
*Third Judicial Department*

*I, Robert D. Mayberger, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that*

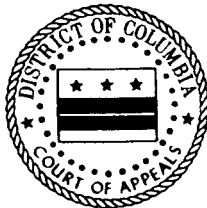
*Michael Edward Tigar*

*having taken and subscribed the Constitutional Oath of Office as prescribed by law, was duly licensed and admitted to practice by this Court as an Attorney and Counselor at Law in all courts of the State of New York on the 11th day of February, 1993, is currently in good standing and is registered with the Administrative Office of the Courts as required by section four hundred sixty-eight-a of the Judiciary Law.*

*In Witness Whereof, I have hereunto set my hand and affixed the Seal of said Court, at the City of Albany, this 11th day of March, 2011.*



*Robert D Mayberger*  
Clerk



District of Columbia Court of Appeals  
Committee on Admissions  
430 F Street, N.W. — Room 123  
Washington, D. C. 20001  
202 / 879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia  
Court of Appeals, do hereby certify that

MICHAEL E. TIGAR

was on the 1<sup>ST</sup> day of APRIL, 1967

duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on March  
14, 2011.

JULIO A. CASTILLO  
Clerk of the Court

By: *Janora J. Dana*  
Deputy Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA,  
  
PLAINTIFF,  
V.  
FREDERIC BOURKE, JR.,  
  
DEFENDANT.  
-----X

**05 Cr. 518 (SAS)**

**CERTIFICATE OF SERVICE**

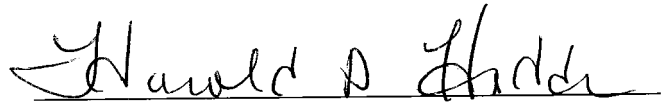
I, Harold A. Haddon, hereby certify under penalty of perjury the following:

1. I am a member in good standing of the bar of this Court, admitted *pro hac vice* as counsel for Defendant Frederic Bourke, Jr., and a member of the law firm Haddon, Morgan and Foreman, P.C.

2. On March 23, 2011, I caused true and correct copies of: Frederic A. Bourke, Jr.'s *Motion for Pro Hac Vice Admission of Michael E. Tigar, Declaration of Jill R. Shellow and Proposed Order for Admission Pro Hac Vice*, to be served upon the following by email and U.S. mail, postage prepaid:

Harry A. Chernoff  
United States Attorney's Office  
Southern District of New York  
One St. Andrew's Plaza  
New York, NY 10007

Dated: March 23, 2011

  
Harold A. Haddon



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA,  
  
          PLAINTIFF,  
V.  
  
FREDERIC BOURKE, JR.,  
  
          DEFENDANT.  
-----X

**05 Cr. 518 (SAS)**

**[PROPOSED] ORDER FOR  
ADMISSION PRO HAC VICE**

Upon request of Harold A. Haddon, as counsel for Frederic Bourke, Jr.

**IT IS HEREBY ORDERED** that

Michael E. Tigar  
552 Fearrington Post  
Pittsboro, NC 27312  
Tel: 202.549.4229  
Email: metigar@gmail.com

is admitted to practice *pro hac vice* as counsel for Frederic Bourke, Jr. in the above-captioned case in the United States District Court for the Southern District of New York.

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. Counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

DATED: \_\_\_\_\_  
New York, New York

\_\_\_\_\_  
The Honorable Shira A. Scheindlin  
United States District Court Judge